

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO 3:22-CR-00274
)	
Plaintiff,)	JUDGE JAMES R. KNEPP II
)	
v.)	
)	<u>NOTICE OF INTENT TO INTRODUCE</u>
)	<u>EXPERT TESTIMONY</u>
)	
AMANDA HOVANEK,)	<u>FORENSIC PATHOLOGIST DR.</u>
ANTHONY THEODOROU,)	<u>JEFFREY HUDSON</u>
)	
Defendants.)	

Now comes the United States of America, by and through its attorneys, Michelle M. Bacpler and Alissa M. Sterling, and pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure and submit that the United States intends to introduce the expert testimony of forensic pathologist Jeffrey Hudson, M.D., Deputy Coroner at trial. Dr. Hudson's opinions and qualifications regarding forensic pathology are contained in the Coroner's Report Finding of Facts and Verdict, in Case No. 22-000047, previously provided to the defense in discovery.

Complete Statement of Opinions

Specifically, Dr. Hudson will opine that T.H. died of etorphine toxicity and that his death was a homicide. Dr. Hudson will testify regarding his receipt and examination of T.H.'s body and the physical appearance and condition of the same. Dr. Hudson will testify regarding the needle puncture wound in T.H.'s lateral left shoulder with underlying soft tissue hemorrhage. He will further explain the frothy edema in T.H.'s trachea caused by the etorphine ingestion. Dr. Hudson will testify regarding the autopsy he performed on the body

of T.H. and the condition of the internal systems. Dr. Hudson will testify regarding the blood and urine specimens he extracted from the body of T.H. for submission to toxicology. Dr. Hudson will opine as to T.H.'s cause of death based upon his physical examination of T.H.'s body and systems, coupled with the results of the toxicology testing.

Basis and Reasons for those Opinions

In identifying the cause of death, Dr. Hudson considered the physical condition of T.H.'s body, as well as the needle puncture wound in the lateral left shoulder, autopsy of T.H.'s body and satisfactory condition of the internal systems, the presence of frothy edemas in the trachea, toxicology results, and history provided by law enforcement.

Dr. Hudson's opinions are more fully set forth in the Coroner's Report Finding of Facts and Verdict (11 pages) that was provided in discovery and is hereby incorporated by reference, as well as his training, education, knowledge, experience, and expertise as a forensic pathologist.

Finally, the documents referenced herein are not an exhaustive or complete recitation of testimony that Dr. Hudson may offer. In addition, he may offer opinions in response to questions posed during trial.

Qualifications

Dr. Hudson is a forensic pathologist and a Deputy Coroner for the Lucas County Coroner's Office. He has been with the Lucas County Coroner's Office since September 2015. He holds a Bachelor of Science in Movement and Exercise Science and a Doctorate in Medicine from the Toledo College of Medicine. He has received additional training as described in the attached Curriculum Vitae.

Dr. Hudson has not authored any publications in the last 10 years.

A copy of Dr. Hudson's Curriculum Vitae is attached as Exhibit 1.

The following is a list of trials and depositions in which Dr. Hudson has testified in the last four years, to the best of Dr. Hudson's recollection and efforts to recreate:

Decedents, Court, Date:

Damcon Bates, Lucas County Common Pleas, 7/18/2023

Sean Kurz, Deposition at law firm, 9/21/2023

Jakia Battle, Allen County Common Pleas, 10/24/2023

Sarah Schulte, Lucas County Common Pleas, 9/11/23

Sarah Schulte, Lucas County Common Pleas, re-trial, 10/24/2023

Antwan Walker, Lucas County Common Pleas, 10/10/2023

Kayla Sedoskey, Monroec County, Michigan, 8/2/2023

Linda Sidle, Van Wert County, 2/15/2022

Benny Parker, Lucas County Common Pleas, 3/22/2022

Deanna Himon, Lucas County Common Pleas, 4/22/2022

Armante Rodgers, Lucas County Common Pleas, 5/9/2022

Timothy White, Allen County Common Pleas, 9/26/2022

Lawrence Stuart, Lucas County Common Pleas, 11/1/2022

Davion Latson, Allen County Common Pleas, 3/20/2023

Additionally, Dr. Hudson is expected to testify in the following upcoming trials, which are scheduled to occur prior to the trial date in this matter:

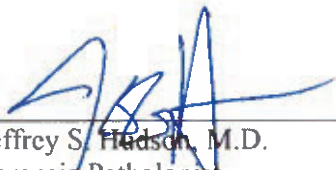
Juwan McCreary, 16th District Court, Macomb County, MI, 1/18/2024

Deasia Green, Lucas County Common Pleas, 1/22/2024

Saniyah Pugh, Frank Murphy Hall of Justice, Detroit, MI, 1/15/2024

Jordan Boston, Frank Murphy Hall of Justice, Detroit, MI, 2/26/2024

Pursuant to Fed. R. Crim. P. 16(a)(1)(G)(v), I approve the foregoing disclosure.



Jeffrey S. Hudson, M.D.
Forensic Pathologist
Deputy Coroner
Lucas County Coroner's Office

The United States hereby requests reciprocal expert disclosure from the defense, pursuant to Fed. R. Crim. P. 16(b)(1)(C).

Respectfully submitted,

REBECCA C. LUTZKO
United States Attorney

By: /s/ Michelle M. Baeppler
Michelle M. Baeppler (0065378)
Assistant U.S. Attorney
United States Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113-1852
(216) 622-3995
Michelle.Baeppler@usdoj.gov

By: /s/ Alissa M. Sterling
Alissa M. Sterling (0070056)
Assistant U.S. Attorney
Four SeaGate, Suite 308
Toledo, Ohio 43604
(419) 259-6376
Alissa.Sterling@usdoj.gov